REMARKS

No claims have been amended. No claims have been canceled without

prejudice. No new claims have been added.

Reconsideration of this application is respectfully requested.

Claims 1-3, 7-12, 17, 18, and 20-27 stand rejected under 35 U.S.C. § 103(a) as

being unpatentable over U.S. Patent Number 5,455,958 by Flurry et al. (hereinafter

"Flurry") in view of U.S. Patent Number 6,157,393 by Potter et al. (hereinafter "Potter").

In regards to claim 1, the Examiner stated:

> Regarding applicant's argument with respect to claim 1 that "Potter does not disclose a time allocator arbitrating the use of the graphics-rendering engine between two or more independent images"... As far as amount of graphical data not being the same as two or more independent images, one cannot look at graphical data in segments and claim this now constitutes an image and now it [is] not an image. The fact that graphical data is processed is sufficient to a person of ordinary skill in the art at the time [the] invention was made to consider processing of graphical data to be equivalent to processing of [an] image.

(Office action, paragraph 3)

Applicants respectfully travserse these objections and submit that the combination of

Flurry and Potter do not render claim 1 obvious under 35 U.S.C §103(a). Claim 1 states:

> An apparatus, comprising:
> a graphics-rendering engine to <u>concurrently render two or more independent images</u> for display on multiple display devices, the two or more independent images include a first independent image and a second independent image;
> ...
>
> ...

(Emphasis Added)

Applicants respectfully disagree with the Examiner that <u>graphical data</u> is the same as the <u>two independent images</u> of claim 1. Potter clearly states that it refers to a first and a second amount of graphical data. There are many references from Potter that show these amounts of graphical data are 1) related and hence not independent; and 2) not complete amounts of data, but rather fractional amounts of data. Potter supports the idea of related, and hence not independent, graphical data by stating, "where the first amount of graphical data is comprised of at least two of the second amounts of graphical data." Col. 2, lines 62-65. Potter further states, "The first amount of graphical data, however, is comprised of at least substantially two times the second amount of graphical data." Col. 1, lines 67 – Col. 2, lines 2. Potter also states, "In preferred embodiments, the first amount of graphical data is a multiple of the second amount of graphical data." Col. 2, lines 7-8. Lastly, Potter states, "In preferred embodiments, a first amount of data that is used to represent each pixel comprises at least substantially two times the second amount of data." Col. 3, lines 32-35. The above language of Potter shows that Potter does not disclose <u>two independent images</u>, but rather <u>two amounts of related graphical data</u>.

On another note, Potter discloses that graphical data can sometimes be in the form of fractional amounts of data, hence furthering the idea that graphical data is not the same as a complete image. If an amount of data is <u>fractional</u>, it may not form a <u>complete</u> image. Potter supports this by stating, "In some embodiments, the destination processor receives fractional graphical data..." Col. 3, lines 9-10. <u>Nothing in Potter suggests that a fractional amount of graphical data represents a complete image.</u>

Hence the use of amounts of graphical data is differentiated from independent images as taught in claim 1.

Applicants also submit that Flurry fails to disclose "the use of the graphics-rendering engine between two or more independent images." Flurry is completely silent regarding the use of the graphics-rendering engine between two or more independent images. If a reference does not discuss a limitation, then that reference cannot disclose or suggest the limitation.

Furthermore, even if Flurry and Potter were combined, such a combination would lack the use of the graphics-rendering engine between two or more independent images. By way of contrast, the combination of Flurry and Potter would disclose a controller where the first amount of graphical data is comprised of at least two of the second amounts of graphical data.

Therefore, in view of the above distinction, neither Flurry nor Potter, individually or in combination, disclose each and every element of claim 1. As such, claim 1 is not rendered obvious by Flurry in view of Potter under 35 U.S.C. §103(a).

Applicants respectfully submit that Flurry does not suggest a combination with Potter, and Potter does not suggest a combination with Flurry because Flurry specifically teaches away from such a combination. Hence, it would be impermissible hindsight to combine Flurry with Potter based on applicants' own disclosure.

Claims 2-12, 14 and 16 all depend upon and include the limitations of claim 1. Therefore claim 2-12, 14 and 16 are also not rendered obvious by the combination of Flurry and Potter under 35 U.S.C. §103(a).

Likewise, independent claim 24 includes the limitation "a time allocator to

arbitrate the use of the graphics-rendering engine between two or more independent

images." As discussed above, the combination of Flurry and Potter doe not teach or

suggest, "a time allocator to arbitrate the use of the graphics-rendering engine between

two or more independent images." As such, claim 24 is not made obvious by the

combination of Flurry and Potter under 35 U.S.C. §103(a).

In regards to independent claim 17, the Examiner states:

> Flurry et al. discloses the concurrently rendering instructions (col. 5, lines
> 25-30); storage in a first memory eare instruction for a first independent
> images; restoring from a second memory area instruction for a second
> independent image (...each entry in the domain array 70 contains a link to
> the device process. RCM 22 can authorize access to independent
> domains of display devices independently ...a device domain is an
> environment with the device to which a graphics process is providing
> data... col.7, lines 1-65).

(Office Action, page 6)

Applicants respectfully travserse these objections and submit that the combination of

Flurry and Potter do not render claim 17 obvious under 35 U.S.C. §103(a). Claim 17

states:

> A method, comprising:
> concurrently rendering instructions associated with multiple independent
> images within a first instruction-stream;
> storing in a first memory area information representing a first rendering
> context associated with a first independent image;
> restoring from a second memory area instructions representing a
> second rendering context associated with a second independent image,
> , wherein the first memory area and the second memory area are included in a
> plurality of memory areas;
> ...
>
> ...

(Emphasis Added)

As stated in the previous response, applicants submit that Flurry does not disclose the concurrent rendering of instructions associated with multiple independent images with a first instruction-stream. In the current office action the Examiner stated that merely pointing to col. 5, lines 25-30 does not provide for a persuasive argument. Examiner restates that col. 7, lines 1-65 describe concurrent rendering of instructions. (Office action, page 2).

Applicants agree with Examiner than col. 7, lines 1-65 describe concurrent rendering of instructions. However there is no discussion of said <u>concurrent rendering of instruction being associated with multiple independent images</u>. Col. 7, lines 30-35 states that, "It should be understood that the RCM 22 can authorize access to independent domains of display devices independently. A device domain is an environment within the device to which a graphics process is providing data." This language does not disclose rendering multiple independent images. A <u>graphics process providing data to multiple display devices is not the same as currently rendering multiple independent images</u>.

As stated in the previous response, Flurry also fails to disclose that the instructions associated with multiple independent images are <u>within a first instruction stream</u>. Flurry is completely silent on this limitation. Examiner failed to state where this limitation is disclose by Flurry.

Applicants also submit that Potter fails to disclose "concurrently rendering instructions associated with multiple independent images within a first instruction-stream". Potter is completely silent regarding the concurrent rendering of instructions

associated with multiple independent images within a first instruction-stream. If a reference does not discuss a limitation, then that reference cannot disclose or suggest the limitation.

Furthermore, even if Flurry and Potter were combined, such a combination would lack "concurrently rendering instructions associated with multiple independent images within a first instruction-stream." By way of contrast, the combination of Flurry and Potter would disclose an <u>RCM that allows for multiple display devices to be connected to it wherein each device may contain a graphics process that provides data</u>.

Therefore, in view of the above distinction, neither Flurry nor Potter, individually or in combination, disclose each and every element of claim 17. As such, claim 17 is not rendered obvious by Flurry in view of Potter under 35 U.S.C. §103(a).

Applicants respectfully submit that Flurry does not suggest a combination with Potter, and Potter does not suggest a combination with Flurry because Flurry specifically teaches away from such a combination. Hence, it would be impermissible hindsight to combine Flurry with Potter based on applicants' own disclosure.

Claims 18 and 20 depend upon and include the limitations of claim 17. Therefore claims 18 and 20 are also not rendered obvious by the combination of Flurry and Potter under 35 U.S.C. §103(a).

Likewise, independent claims 21 and 25 includes "the concurrent rendering of instructions associated with multiple independent images within a first instruction-stream." As discussed above, the combination of Flurry and Potter do not disclose this

limitation. As such, claims 21 and 25 and not rendered obvious by the combination of Flurry and Potter under 35 U.S.C. §103(a).

Claims 22, 23, 26 and 27 all depend upon and include the limitations of independent claims 21 and 25, respectively. Therefore claims 22, 23, 26 and 27 are also not rendered obvious by the combination of Flurry and Potter under 35 U.S.C. §103(a).

Conclusion

It is respectfully submitted that in view of the amendments and remarks set forth herein, the rejections and objections have been overcome. **Applicants have also enclosed a Notice of Appeal.** Applicants reserve all rights with respect to the application of the doctrine equivalents. If there are any additional charges, please charge them to our Deposit Account No. 02-2666. Applicant respectfully requests that a timely Notice of Allowance be issued in this case.

Respectfully submitted,

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Dated: _____2-16-05_____   _____

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